THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PROMEDEV, LLC dba RELIEF FACTOR Plaintiff, v. ROBY WILSON (individual) and MAXXIMEDIA ADVERTISING CO; and IMAGIPIX CORPORATION. Defendants.	Case No. 2:22-CV-01063-JLR **STIPULATED MOTION AND [PROPOSED] ORDER STRIKING PRE-TRIAL DEADLINES AND SETTING SCHEDULE TO RESOLVE REMAINING ISSUES** **NOTING DATE: APRIL 19, 2024**

WHEREAS, on April 1, 2024 the Court entered partial summary judgment, dismissing Promedev's claim for civil coercion, extortion, or blackmail and dismissing Maxximedia's claims for copyright infringement, breach of the implied covenant of good faith and fair dealing, and trade secret misappropriation. Dkt. #93. On April 12, 2024, the Court further dismissed Maxximedia's claim for breach of contract. Dkt. #111. On April 18, 2024, the Court further dismissed Promedev's claim for breach of contract. Dkt. #117.

AND WHEREAS, all parties agree that trial in this case, currently set to begin on May 7, 2024, is no longer necessary. The parties agree that no appellate rights are waived by submission of this stipulation but instead seek entry of judgment consistent with the orders already entered by the Court. The parties respectfully request that the Court strike all remaining trial deadlines and set the following deadlines to resolve all remaining issues in this case:

STIPULATED MOTION AND [PROPOSED] ORDER
STRIKING PRETRIAL DEADLINES - 1
CASE NO. 2:22-CV-01063-JLR

DLA Piper LLP (US)
701 Fifth Avenue, Suite 6900
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1. No later than April 26, 2024, the parties shall submit a proposed judgment as to all claims, including the claims already resolved by the Court and Promedev's remaining claim for declaratory judgment (addressing, *inter alia*, ownership of the creative works and registered copyrights), and which shall be consistent with the Court's prior rulings. If the parties cannot agree on the form of the judgment, Promedev and Defendants shall each submit a proposed judgment and may submit briefs in support of their respective proposed judgments, limited to 1,500 words each.

2. To the extent any party intends to move for attorney fees and costs, any such motion shall be filed no later than May 9, 2024, and shall be noted as a third Friday motion pursuant to Local Civil Rule 7(d)(3).

IT IS SO STIPULATED.

Respectfully submitted this 19th day of April, 2024.

DLA PIPER LLP (US)

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STIPULATED MOTION AND [PROPOSED] ORDER
STRIKING PRETRIAL DEADLINES - 2
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2   ~~[PROPOSED]~~ ORDER

3   The Court hereby grants the Parties' Stipulated Motion Striking Pretrial Deadlines and

   ORDERS as follows:

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5   1. No later than April 26, 2024, the parties shall submit a proposed judgment as to

6   all claims, including the claims already resolved by the Court and Promedev's

7   remaining claim for declaratory judgment (addressing, *inter alia*, ownership of

8   the creative works and registered copyrights), and which shall be consistent with

9   the Court's prior rulings. If the parties cannot agree on the form of the judgment,

10   Promedev and Defendants shall each submit a proposed judgment and may submit

11   briefs in support of their respective proposed judgments, limited to 1,500 words

                   each.

12   2. To the extent any party intends to move for attorney fees and costs, any such

13   motion shall be filed no later than May 9, 2024, and shall be noted as a third Friday

14   motion pursuant to Local Civil Rule 7(d)(3).

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16   IT IS SO ORDERED on this 19th day of April, 2024.

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19   The Honorable James L. Robart
                                                    United States District Judge

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